



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

EO-2
970257

OCT 29 1997

Reply To
Attn Of: ECO-088

Steven F. Robison
Caribou National Forest
250 South 4th Ave.
Federal Building, Room 187
Pocatello, Idaho 83201-6498

Fred Hagius
Pocatello Resource Area
Bureau of Land Management
1111 North 8th Ave.
Pocatello, Idaho 83201

Dear Mr. Robison and Mr. Hagius:

The Environmental Protection Agency has reviewed the Caribou National Forest Phosphate Leasing Proposal Draft Environmental Impact Statement (draft EIS) in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. The draft EIS analyzes five Alternatives for leasing tracts of land to be mined for phosphate within the Caribou National Forest, Caribou County, Idaho. We understand our comments are late and we appreciate your willingness to incorporate our letter into the public record for this project.

Based upon a limited review, we have rated the draft EIS EO-2 (Environmental Objections -Insufficient Information). We are concerned that implementation of best management practices and associated mitigation measures may not ensure protection of resources within and downstream of the project area. It is not clear that mitigation measures implemented on past projects have helped to offset the impacts from mining activities. The State of Idaho has identified several impaired stream segments (found on the State Clean Water Act 303(d) list of impaired water bodies) within the project area, indicating that water quality has been degraded in the past and there is a strong need to ensure that further degradation will not occur in these areas.

The draft EIS states that "the issuance of a lease constitutes the point of irreversible and irretrievable commitment of resources (page S-1)." It also states that "issuance of a competitive phosphate lease conveys the right to mine and develop the phosphate reserves within the lease (page S-1)." These two statements indicate a high level of certainty that mining will occur if a

lease is issued. Because of this, EPA believes that this draft EIS does not contain enough site-specific information to adequately describe impacts to resources in the event that a competitive lease is offered. Without additional information on 303(d) waters, wetland impacts, air quality impacts and wildlife impacts, EPA does not believe it is possible to determine which stipulations are necessary to mitigate anticipated impacts or protect existing resources. These concerns must be evaluated before the Forest Service issues a final EIS and Record of Decision for the proposed phosphate leases.

An explanation of the EPA rating system for draft EISs is enclosed for your reference. We would like to discuss these concerns further with you and your staff. Please call John Bregar of my staff at (206) 553-1984 at your convenience to set up a framework for resolving our issues of concern on this proposed project.

Sincerely,

A handwritten signature in black ink that reads "Richard B. Parkin". The signature is written in a cursive, flowing style with a large initial 'R'.

Richard B. Parkin, Manager
Geographic Implementation Unit

Summary Paragraph Form

ERP Number D-AFS-L65292-ID

RATING

EO-2

COMMENT/LTR

10/29/97

Name of EPA Official Responsible For Review Of Project (Principal Reviewer)

John Bregar

Summary

expressed environmental objections
~~EPA is concerned that implementation of best management practices and associated mitigation measures may not ensure protection of resources within and downstream of the project area. It is not clear that mitigation measures implemented on past projects have helped to offset the impacts from mining activities. The State of Idaho has identified several impaired stream segments within the project area, indicating that water quality has been degraded in the past and there is a strong need to ensure that further degradation will not occur in these areas.~~

about project impacts on water quality, including 303(d) listed waters. Specific mitigation measures need to be included in the Final BIS.

Approved For Publication

(Initials of OFA
Approving Official)

Note: Transmit 2 copies to MIU